Message

From: Kimball, Lori (Chip) K [lkimball@blm.gov]

Sent: 9/28/2020 8:12:06 PM

To: Robinson, Valois [Robinson. Valois@epa.gov]

Subject: RE: [EXTERNAL] Information on improperly plugged boreholes s in the NRC SEIS

This is great, Valois. Thank you for the information.

Chip

From: Robinson, Valois < Robinson. Valois@epa.gov>

Sent: Monday, September 28, 2020 8:15 AM **To:** Kimball, Lori (Chip) K < lkimball@blm.gov>

Subject: [EXTERNAL] Information on improperly plugged boreholes s in the NRC SEIS

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Hi Chip,

The attached text file includes some excerpts about improperly plugged boreholes from the NRC SEIS.

In its April 30, 2015, Partial Initial Decision, the Atomic Safety and Licensing Board added a new license requirement related to boreholes:

https://www.nrc.gov/docs/ML1512/ML15120A299.pdf p. 73

Therefore, the Board will amend license SUA-1600 with a similar condition that was included in the Strata license. License SUA-1600 shall be amended to include an additional license condition stating:

Prior to conducting tests for a wellfield data package, the licensee will attempt to locate and properly abandon all historic drill holes located within the perimeter well ring for the wellfield. The licensee will document, and provide to the NRC, such efforts to identify and properly abandon all drill holes in the wellfield data package.

EPA thinks that Powertech did due diligence in trying to locate improperly plugged boreholes that are leaking at the ground surface in the permit application. The EPA Class III UIC permit requires that Powertech identify and repair leaky boreholes that compromise confining zones during the wellfield pump tests. The attached PowerPoint illustrates how that would work. If I didn't explain something clearly enough, please let me know.

Looking forward to talking this afternoon!



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